

Submission: Summary of Ideas

Cities: CDBG Plus Working Group

The purpose of this submission is to summarize the meaningful ideas generated by the Cities: CDBG Only Working Group as part of the ConPlan Improvement Initiative (CPII). These ideas are being forwarded to the CPII Steering Committee with the ultimate objective of forwarding to HUD's Assistant Secretary of Community Planning and Development for consideration and possible action. These ideas may require changes that will be administrative, regulatory, or statutory in nature.

Purpose of Cities Plus Working Group

The purpose of the Cities Working Group is to address issues and develop ideas for streamlining the ConPlan process that are of particular relevance to Cities. Two working groups will address City issues. The Cities: CDBG Plus WG consists of participants who administer the CDBG Program plus at least one other CPD formula grant program. The Cities: CDBG Only WG has participants interested in CDBG-Only Grantee issues

Working Group Profile:

Co-Chairs: Steve Sachs and Wendy Cherubini.

Members:

Lisa Baker, President, Baker Street Associates, LLC, Long Beach, CA
Douglas Brown and LaCree Carswell, Community Development Division, Jacksonville, FL.
Susanne Browne, Legal Aid Foundation of Los Angeles, CA
Wendy Cherubini, Manager, Housing and Community Development Division, Portland, ME
Paul Connolly, Housing and Community Development, Somerville, MA
Janet Cudmore-Boswell, Cambridge Community Development, Cambridge, MA
Marian Eichner, Office of Grants Management, Hartford, CT
Jeff Falcusan, National Community Development Association, Washington, DC
Nancy Haney and Todd Steelman, Community Development, Lubbock, TX
Larry Holt, Greensboro Housing Authority, Greensboro, NC
Rosalind Kotz, Department of Real Estate and Housing, Wilmington, DE
Mark McComus, Senior Community Development Analyst, Cincinnati, OH
Steve Sachs (Co-Chair) CPD San Francisco Field Office, San Francisco, CA
Charles Sorrentino, Calvin Parker, and Ted Gallagher, Department of City Planning, NY, NY
Beth Steckler, Livable Places, Los Angeles, CA
Ellen Lee and Barry Walton, Neighborhood Development, New Orleans, LA
Karna Wong, CPD San Francisco Field Office, San Francisco, CA
Staff: Pat Heidel, Aspen Systems Corporation, Rockville, MD

Meeting Dates: July 2, July 24, and August 22, 2002

Fast Track Ideas

1. Training for HUD Field Office staff and CPD grantees

Discussion: Participants concluded that Field Office (FO) review of ConPlans is often subjective and inconsistent. Furthermore, both FO staff and grantees need training on what streamlining is permissible. Therefore, the WG is developing specific recommendations for training both groups. (See 2 below)

2. ConPlan Items to delete or redefine.

Discussion: Participants completed a chart that will summarize all WG members' recommendations for: (1) Redefining/ defining, eliminating, or cross-referencing different ConPlan components and (2) Ideas for FO and grantee training. Many items will be fast track ideas that will streamline the ConPlan, reduce administrative burdens, and improve performance measurement.

Note: Chart appears at the end of this summary.

Pilot Recommendation: Cross-Reference Existing Local Plans

Discussion: To reduce duplication with applicable local plans (for example, local economic development plan), ConPlan could incorporate or link to these existing documents, rather than develop new ones. Currently, grantees use different approaches to required ConPlan elements (Such as: attaching executive summaries as an appendix to ConPlan, summarizing the applicable local plan, Cutting and pasting sections of other plans into ConPlans, giving Website link to relevant local plan, citing and referring reader to relevant page in local plan, establishing committees with membership from applicable local agencies, or asking local agencies to prepare these sections of the ConPlan.)

As a pilot, a small group of grantees that have ConPlans due in 2003 would work with CPD staff. First, the group would determine if summaries of or references to other local plans meet CPD requirements. Next, each volunteer city would prepare a ConPlan incorporating or referring to existing local plans.

In terms of cross-referencing existing local plans in the ConPlan, participants raised these issues.

- The local body approving the ConPlan may or may not be the same body approving cross-referenced plans. Should the ConPlan cross-reference only plans approved by the body approving the ConPlan?
- Given the diversity of local plans and approval processes, HUD should not mandate a single streamlining procedure for cross-referencing. Grantees develop, incorporate, or cross-reference local plans in different ways—executive summaries, Internet links, cutting and pasting key sections, or new plans.
 - Goal: Streamlining ConPlan.
 - Volunteers: Steve Sachs is coordinated pilot effort among grantees that are submitting 2003 ConPlan and are interested in volunteering for pilot.

Performance Measurement Issues and Recommendations

- How can we refine goals and objectives more meaningful to generate more meaningful performance measurements?
- How do we establish meaningful standards, given the variety of activities that most grantees undertake?
- Existing performance standards tend to reflect outputs—they are numerical and precise (for example, number of housing units produced or rehabilitated).
- It is more difficult to develop, longer-term impact measures (e.g. number of persons moving to full-time jobs). However, some WG members are developing outcome measurements.
- There is a need to refine and develop performance measurements for different types of activities. Developing performance measurements for multi-year, public service, or more complex programs is challenging. There is a need to refine measurements for these activities. For example, breaking a project into stages (such as, planning, environmental review, design, construction, completion, and occupancy) can allow grantees to measure performance and show progress.
- Having different time periods for expending HOME, CDBG, and other CPD funds complicates performance measurements.

General Discussion Ideas

1. Purpose of ConPlan

Discussion: Participants continued discussing the ConPlan's purpose. Is it an application for HUD funding or a policy plan? The purpose affects the type and degree of streamlining that is acceptable.

2. Length of public comment period.

Discussion: There was general agreement that we need to improve citizen participation process but no agreement on changing length of comment period. WG has different opinions about the length of the public comment period. Most participants favor shortening the public comment period to 15 days or keeping the 30-day period. However, one member recommended lengthening the ConPlan comment period—since ConPlans are long and not user-friendly, the public needs more time to read and analyze information before making comments. Another suggestion that others supported was lengthening the comment period for the CAPER.

2. Time-period covered by the ConPlan.

Discussion: Does a ten-year plan, with optional five-year amendment, make more sense, given the reliance on census data? HUD should establish similar due dates for PHA and Consolidated Plans.

3. ConPlan II Website

Discussion: There should be more information (such as the 2 tables that CDBG Plus WG is currently completing) posted on the ConPlan II Website.

4. Pros and Cons of Needs Assessments

Discussion: ConPlan needs assessment section have both advantages and disadvantages. On the one hand, needs assessments document why communities need additional funding, thereby enhancing lobbying efforts. On the other hand, assessments typically indicate that grantees are addressing only a small portion of community needs.

Therefore, there is a need to refine the assessment and develop categories of need, such as “Priority for CDBG Program,” or “Intermediate Need.” Establishing more specific categories will allow grantees to specify what it can realistically accomplish, given the level of CPD funding and the ConPlan/Action Plan time period.

Next Page: Working Group Charts: Items to Define, Redefine and Eliminate. Suggested Training for FOs and grantees.